AMERICAN MEAT INSTITUTE

J. Patrick Boyle
President and C.E.O

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Livestock and Seed Programs
Agricultural Marketing Service
U.S. Department of Agriculture
Stop 0249, Room 2092-S
Washington, DC 20250-0249

Re: FARM BILL REQUIREMENT ON APPROVED FOOD SAFETY TECHNOLOGIES FOR USE IN COMMODITY PURCHASE PROGRAMS

To Whom It May Concern:

Thank you for the opportunity to provide input on the 2002 Farm Bill requirement to allow approved food safety technologies to be utilized on products offered through the commodity purchase programs. The American Meat Institute (AMI or the Institute) represents the interests of packers and processors of beef, pork, lamb, veal, and turkey products and their suppliers throughout North America. Together, AMI members produce 95 percent of the beef, pork, lamb, and veal products and 70 percent of the turkey products available in the United States. Food safety is paramount to AMI members and the meat industry generally. In that regard, industry should be allowed to utilize all approved food safety technologies, including irradiation, to achieve this important goal.

Meat and Poultry Irradiation has been Approved by Scientific and Governmental Bodies Domestically and Internationally

On December 2, 1997, the Food and Drug Administration (FDA) issued a final rule authorizing irradiation of raw meat to control foodborne pathogens and extend product shelf life. On August 17, 1998, FDA amended the December 1997 rule to allow more flexibility in the labeling of irradiated products. On March 4, 1999, the Food Safety and Inspection Service (FSIS) published a proposed rule and on December 23, 1999, issued a final rule permitting irradiation of raw meat. That final rule requires that irradiated meat products bear the radura symbol and a label identifying the product as irradiated.

The U.S. General Accounting Office on September 26, 2000, released a report titled "Food Irradiation: Available Research Indicates That Benefits Outweigh Risks." That report concludes that scientific studies conducted worldwide over the past 50 years support the benefits of food irradiation, while indicating minimal potential risks. The report cites a World Health Organization expert panel that reviewed the findings of more than 500 studies and concluded that food irradiation creates no toxicological, microbiological, or nutritional problems, but has many benefits, including reducing foodborne pathogens, extending shelf life, and controlling pests.

Because of the February 2000 final rule, several companies have introduced irradiated ground beef into the marketplace. Available information indicates that these products have been well received by the retail trade, as well as the consuming public. In that regard, large companies currently offering irradiated ground beef include: Giant Foods, Wegmans, Price Chopper, Hy-Vee Supermarkets, D'Agostino Supermarkets, Publix, Pathmark Supermarkets, Price Chopper, Schwan's, Omaha Steaks, Sysco, Huisken Meats Company, W.W. Johnson, Farm Fresh, and Dairy Queen.

Irradiated Meat Products would benefit the Public Health

The 2002 Farm Bill provides that USDA "shall not prohibit the use of any technology to improve food safety that has been approved by the Secretary of Agriculture or has been approved or is otherwise allowed by the Secretary of Health and Human Services" for use in various commodity purchase programs. Technologies, such as irradiation, that have been approved and proven effective in reducing or eliminating foodborne pathogens, are essential tools for producing safe food.

Health experts have stated that irradiation can help control potentially harmful bacteria such as *Escherichia coli* O157:H7 (hereinafter *E. coli*), *Salmonella,* and *Campylobacter*. The segment of the population most at risk for contracting foodborne illnesses includes infants, children, and pregnant women. These individuals happen to be the bulk of the participants in commodity programs such as the School Lunch Program and Women, Infants, and Children (WIC). As a result, prohibiting the use of technologies that can aid in providing the safest food achievable to these populations is inappropriate.

Irradiated Meat Products should be allowed in Commodities Programs

In October 2002, AMI's Board of Directors agreed to recommend the Agricultural Marketing Service (AMS) establish a pilot program for purchasing irradiated ground beef in the School Lunch commodity beef-purchasing program. AMI members recognize that no pilot program will be successful without educating consumers on the benefits of irradiation. Government and industry have agreed that once consumers learn the facts about food irradiation and its benefits, they will buy and eat irradiated foods. This education must come from trusted sources, particularly the U.S. government or medical and public health associations.

AMI supports making available all technologies, including irradiation, to improve the safety of meat and poultry products. To that end, the AMS prohibition against purchasing irradiated ground beef should beef immediately.

Thank you for the opportunity to comment on this important topic. If AMI can assist in expediting the including of irradiated ground beef in the school lunch programs, please contact me. We look forward to working with you in the future.

Sincerely,

J. Patrick Boyle
President and Chief Executive Officer